

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
PLAINTIFF,

VS.

LUIS MIRANDA GOMEZ

CRIM. NO. 98-013 (HL)(JAF)

DEFENDANT

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**MOTION REQUESTING MODIFICATION OF SUPERVISED CONDITIONS OF  
RELEASE TO ALLOW UNRESTRICTED TRAVEL**

TO THE HONORABLE COURT:

NOW COMES LUIS MIRANDA GOMEZ, through undersigned counsel, and respectfully requests that the Court modify his conditions of supervised release so as to permit Mr. Miranda unrestricted travel.

OVERVIEW OF CASE

Mr. Luis Miranda Gomez was sentenced by the Honorable Hector Laffitte on January 31, 2006 to time served and a five year term of supervised release. Said sentence was pursuant to a Rule 35(b) motion filed by the government requesting a reduction in sentence due to changed circumstances. Upon the retirement of Judge Laffitte this case was subsequently assigned to the Honorable Jose A. Fuste.

The main reason for the reduction was the compelling evidence of Mr. Miranda's deteriorating mental and physical state. For years Mr. Miranda has suffered from severe depression to the extent that he has been frequently admitted involuntarily to psychiatric institutions. His condition is explained in greater detail in documents under the seal of the Court.

1. Mr. Miranda has diligently complied with all standard and special standards of supervised release. He completed his twelve month term of house arrest and paid his fine.

2. Mr. Miranda is currently under medical care both in Puerto Rico and the United States, specifically in Tampa, Florida. While abroad receiving treatment, Mr. Miranda has complied strictly with the reporting requirements of the Office of Probation as attested to by his supervising probation officer Miguel Arroyo.

3. Standard condition of release # 1 requires that a defendant may not leave the judicial district without permission of the court or probation officer. This condition requires that the probation officer inform the court every time a defendant travel outside the judicial district. It creates a heavy burden both for a defendant in Mr. Miranda's situation and the probation office who must constantly file the required paperwork .

4. Probation Officer Miguel Arroyo has informed the undersigned that he completely supports Mr. Miranda's request for unrestricted travel and in fact, recommended this filing in order to relieve the burden on all concerned parties.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, This 24<sup>th</sup> day of 2007.

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CERTIFICATE OF SERVICE

I hereby certify that on April 24<sup>th</sup>, 2007, I electronically filed the foregoing to the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

At San Juan, Puerto Rico, this 24<sup>th</sup> day of April of 2007.

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